

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NIASPAN ANTITRUST LITIGATION	MDL No. 2460 Master File No. 2:13-md-2460-JD
This Document Relates to: All Actions	

**Stipulation Regarding Direct Purchaser Class Plaintiffs' Motion to Compel Zydus
Pharmaceuticals to Produce Subpoenaed Electronic Sales Data**

WHEREAS Direct Purchaser Class Plaintiffs filed their Motion to Compel Zydus Pharmaceuticals (USA) Inc. ("Zydus") to Produce Subpoenaed Electronic Sales Data on April 20, 2017 (ECF No. 399) regarding a subpoena served on March 25, 2015.

WHEREAS Zydus's response to the Motion to Compel is due May 12, 2017. ECF No. 407.

WHEREAS Direct Purchaser Class Plaintiffs served on Zydus a Subpoena to Testify at Deposition dated April 20, 2017, which Zydus objected to on April 26, 2017.

WHEREAS Direct Purchaser Class Plaintiffs and Zydus are engaged in a meet and confer process to resolve the Motion to Compel and the subpoenas.

Direct Purchaser Class Plaintiffs and Zydus stipulate as follows:

1. Zydus has agreed to produce actual sales data in Excel format, covering the period from June 2014 through December 31, 2016, available in reasonably accessible databases kept in

the ordinary course of business. Zydus will work to make that data production on or before May 31, 2017.

2. Zydus has agreed to provide written answers to Direct Purchaser Class Plaintiffs' data interpretation questions as outlined in Direct Purchaser Class Plaintiffs' May 3, 2017 letter. Zydus has agreed to answer those questions on or before May 19, 2017.

3. Direct Purchaser Class Plaintiffs have agreed to suspend the Subpoena to Testify at Deposition dated April 20, 2017 pending Zydus's production of data and answers to the data interpretation questions.

4. In the interest of judicial economy and to permit the parties the opportunity to resolve the Motion to Compel by agreement, the parties agree that Zydus need not file a responsive brief in opposition to the Motion to Compel Production at this time.

5. Both Direct Purchaser Class Plaintiffs and Zydus reserve all rights, and in the event that Direct Purchaser Class Plaintiffs or Zydus deem it necessary to litigate the Motion to Compel or otherwise litigate either subpoena, they shall notify the Court.

Date: May 12, 2017

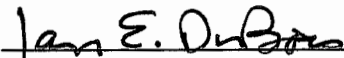
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Approved this 15th day of MAY, 2017



Hon. Jan E. DuBois
United States District Judge